

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

VINCENT HENDERSON

*Plaintiff,*

V.

HARRIS COUNTY, RON  
HICKMAN, AND MICHAEL  
RICHARD,  
*Defendants.*

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CIVIL ACTION NO. 4:18-CV-413

JURY DEMANDED

**DEFENDANTS HARRIS COUNTY AND MICHAEL RICHARD'S  
SUPPLEMENTAL RULE 26 DISCLOSURES**

Defendants Harris County and Michael Richard collectively ("Defendants") now serves their Supplemental Disclosures pursuant to FED. R. CIV. P. 26(a)(1) and for its supplemental disclosures states as follows:

**(1) Fed. R. Civ. P. 26 (a)(1)(A)(i): Individuals Likely to Have Discoverable Information that the Disclosing Party May Use to Support its Defenses:**

The following individuals are believed to have personal knowledge regarding events related to the Plaintiffs' claims in this lawsuit:

Vincent Henderson, Plaintiff  
c/o Damon Mathias  
Mathias Raphael PLLC  
13601 Preston Rd., Ste. W217  
Dallas, Texas 75240  
Telephone: (214) 713-1000  
Email: [damon@mrlaw.co](mailto:damon@mrlaw.co)

Harris County, Defendant  
Michael Richard, Defendant

c/o Suzanne Bradley  
Assistant County Attorney  
1019 Congress, 15<sup>th</sup> Floor  
Telephone (713) 274- 5330  
Email: [suzanne.bradley@cao.hctx.net](mailto:suzanne.bradley@cao.hctx.net)

Defendants in this proceeding and they has knowledge as to the alleged incident on which this lawsuit is based.

Harris County Detention Sergeant A. Boone  
Harris County Captain Curtiss Ruggles  
Harris County Sergeant WalBurton  
Harris County Detention Officer A. Vincent

Harris County Detention Officer T. Wooten  
Harris County Detention Office R. Hoskins  
Harris County Detention Officer L Bosch  
Harris County Detention Officer L. Williams

Lt. James Wager  
Office of Inspector General  
Internal Affairs

Sgt. Kimberly Lee  
Office of Inspector General  
Internal Affairs

Deputy Tami Steptoe  
Office of Inspector General  
Internal Affairs  
Captain Warner Ervin II  
Office of Inspector General  
Internal Affairs

Hubert Williston, M.D.  
Medical Staff  
Harris County Sheriff's Office  
Health Service

Dianna Johnson  
Doreen Jones A.R.N

Marya A. Bennett LVN  
Leonard F. Cowden PA  
Kerry Diaz CCA  
Tia C Paley CCA  
George H Steed OD  
Michael O. Gubman LVN  
Jacqueline A. Stake R.N.  
Abelina Molina LVN  
Alice D. Nowack CCA  
Timothy C Allen MD  
Anthony Okorodudu  
Satya Ramadass MD  
Fernando Cesani MD  
Katherine D. Werner RN  
TDCJ - Lynch  
2350 Atascocita Road  
Humble, TX 77396

Gary Christman R.D.D.S.  
Tammy K. Ramirez L.V.N.  
Richard E Young NP  
Pamela D. Henry L.V.N  
Erik S. Johnson MD  
Marion P. Shaver LVN  
D. Tsamouris LPC-1  
Barbara F Thomas LVN  
Kendra S. Phelps MA LPC  
Beverly S. Clark CCA  
TDCJ – Kegans (HM)  
707 Top St. Houston, TX 77002

Chris Wright MD  
Woodlake MRI  
1065 Gessner Rd, Ste. 100  
Houston, TX

Mike Yuan MD PHD Alliance  
Medical Specialists  
1065 Gessner Rd, Ste. 202  
Houston, TX 77055

Ana Uribe LVN

LaToya N. Bush LVN  
George Griffin MD  
Christina Casas LVN  
Hubert N. Williston MD  
Stephen Kaminsky  
Harris County Sheriff's Office – Health Services  
1200 Baker St.  
Houston, TX 77002

Kimberly Burrage, OD Hattiesburg  
Eye Clinic PA  
1621 Hwy 15 North  
Laurel, MS 39440

c/o Suzanne Bradley  
Assistant County Attorney  
1019 Congress, 15<sup>th</sup> Floor  
Telephone (713) 274- 5330  
Email: [suzanne.bradley@cao.hctx.net](mailto:suzanne.bradley@cao.hctx.net)

Defendants incorporate by reference as if fully set forth herein each of the individuals identified in each of the documents produced to or made available for Plaintiff's review, including, but not limited to, all the individuals identified in the Harris County Sheriff's Office Internal Affairs Division reports or other investigative reports, and all individuals identified in the Initial Disclosures, and any amendments and/or supplements thereto, all of Defendants' discovery responses, and any amendments and/or supplements thereto, documents produced or in any other fashion as part of any other civil litigation which has been produced to or made available for Plaintiff's review.

All individuals identified in Plaintiff's Initial Disclosure.

**(2) Fed. R. Civ. P. 26 (a)(1)(A)(ii): Description of Documents by Category that the Disclosing Party May Use to Support Defenses:**

1. Documents containing miscellaneous policies, procedures, and reports concerning Harris County and the Harris County Sheriff's Office.
2. Documents concerning training of Harris County Sheriff's Deputies and Detention Officers.

3. Documents and Investigative Reports relating to Plaintiff's actions, asserted claims and Plaintiff's allegations that are the subject of this litigation.
4. Plaintiff's Medical Records.
5. Video Recording of event.
6. Plaintiff's Harris County Health Service Records.
7. All records, documents, memorandums, interviews and statements referenced and identified in HC Bates stamped 00001 -29957, which have been produced.
8. Records and documents referenced in Plaintiff's Initial Disclosures and response to Defendants' pretrial discovery request.

(3) **Fed. R. Civ. P. 26 (a)(1)(A)(iii):**

Defendants may seek their attorneys' fees and costs of defense pursuant to 42 U.S.C. Section 1988. If sought, the attorneys' fees will be calculated by multiplying the number of hours spent by Defendants' attorneys by the appropriate hourly rate as established by its experts. Defendants have not yet made a calculation of the fees and costs it may seek. Defendants will supplement when they have done so.

(4) **Fed. R. Civ. P. 26 (a)(1)(A)(iv):**

Not applicable.

(5) **Fed. R. Civ. P. 26 (a)(1)(D)(2):**

Defendants have designated experts in accordance with the court's scheduling order.

Jay Coons, Ph.D.  
Department of Criminal Justice and Criminology  
College of Criminal Justice  
Sam Houston State University  
P.O. Box 2296  
Huntsville, TX 77340  
(See attached report and CV)

Carolyn R. Carman, O.D., F.A.A.O.  
4901 Calhoun Road  
Houston, TX 77204-2020

Respectfully submitted,

/S/ Suzanne Bradley

OF COUNSEL:

CHRISTIAN D. MENESEE  
HARRIS COUNTY ATTORNEY  
TEXAS BAR NO. 24088049

**SUZANNE BRADLEY**  
Assistant County Attorney  
Federal ID No. 24567  
State Bar No. 00793375  
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Houston, Texas 77002  
Telephone: (713) 274-5330  
[suzanne.bradley@cao.hctx.net](mailto:suzanne.bradley@cao.hctx.net)

ATTORNEY FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2021, a true and correct copy of this Defendants' Supplemental Disclosures was served upon the following parties by ECF notice.

Damon Mathias  
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13601 Preston Rd., Ste. W217  
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Email: [damon@mrlaw.co](mailto:damon@mrlaw.co)

*/S/ Suzanne Bradley*  
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Suzanne Bradley  
Assistant County Attorney